

ORIGINAL

INVITE

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

**BARBARA A. WILHELM,
Plaintiff**

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V.

• NO. 1:CV-01-1057

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2

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Defendants

COMMONWEALTH OF PA.; : **(JUDGE RAMBO)**
PENNSYLVANIA STATE POLICE; :
:
:
:
Defendants :

FILED
HARRISBURG, PA

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**PLAINTIFF'S UNCONTESTED MOTION FOR AN
ENLARGEMENT OF TIME TO FILE PETITION FOR
ATTORNEY'S FEES AND COSTS**

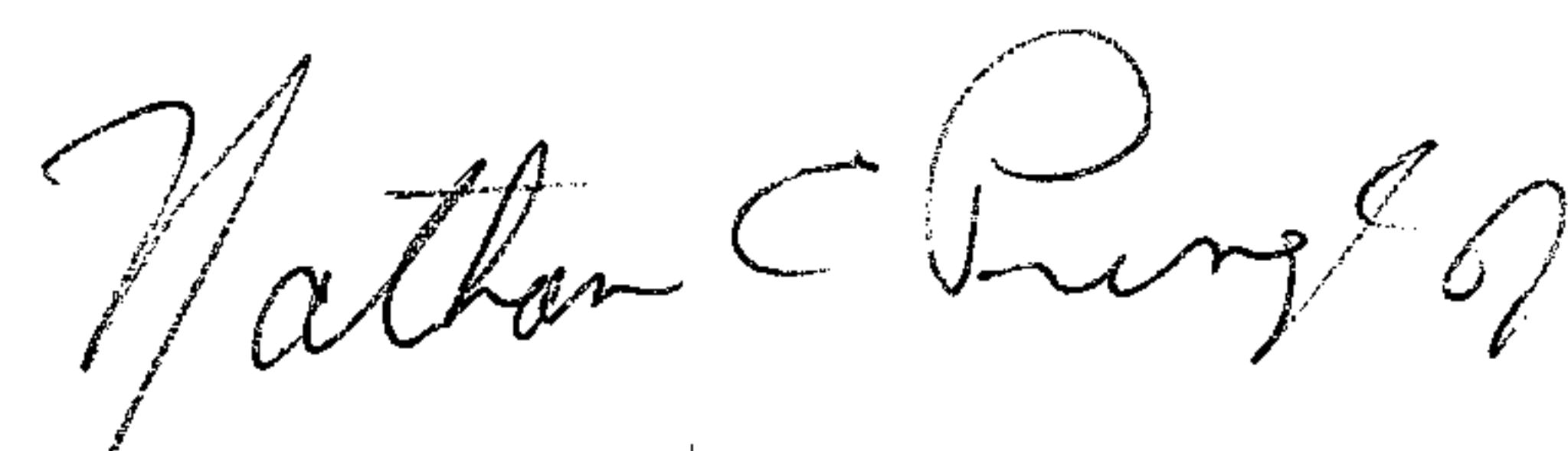
Pursuant to Fed.R.Civ.P. 6(b), plaintiff, Barbara A. Wilhelm, by and through her attorney, Nathan C. Pringle, Jr., respectfully requests an enlargement of time of three days, to and including May 5, 2003, to file plaintiff's petition for attorney's fees and costs, and in support thereof, sets forth the following:

1. On April 9, this court issued an order granting interest on damages awarded to the plaintiff in the above-captioned matter, and permitting the plaintiff to file a petition for attorney's fees no later than April 25, 2003. The offer was received by plaintiff's counsel on April 10, 2003.

3. Plaintiff's counsel had previously scheduled a trip to London, England, which is scheduled to start on April 15, 2003 and scheduled to end on April 25, 2003, at 6:30 P.M.
4. As a result of the trip, plaintiff's counsel needed an additional seven days to file the petition for attorney's fees and costs.
5. The requested enlargement of time to file the petition no later than May 2, 2003 was granted.
6. During plaintiff's counsel's absence, several clients incurred problems requiring counsel's immediate attention upon his return
7. These problems demanded more time than anticipated.
8. A delay of three days in filing the petition will not prejudice the rights of the defendants.
9. Counsel for plaintiff has contacted defendants' counsel, Susan J. Forney, who has no objection.

WHEREFORE, the plaintiff, Barbara A. Wilhelm, respectfully requests an enlargement of time of three days, to and including May 5,003, to file a petition for attorney's fees and costs.

Respectfully Submitted,



Nathan C. Pringle, Jr.
Attorney I. D. Number 30142
3601 North Progress Avenue
Suite 200
Harrisburg, PA 17110
(717) 909-8520
Attorney for Plaintiff

May 1, 2003

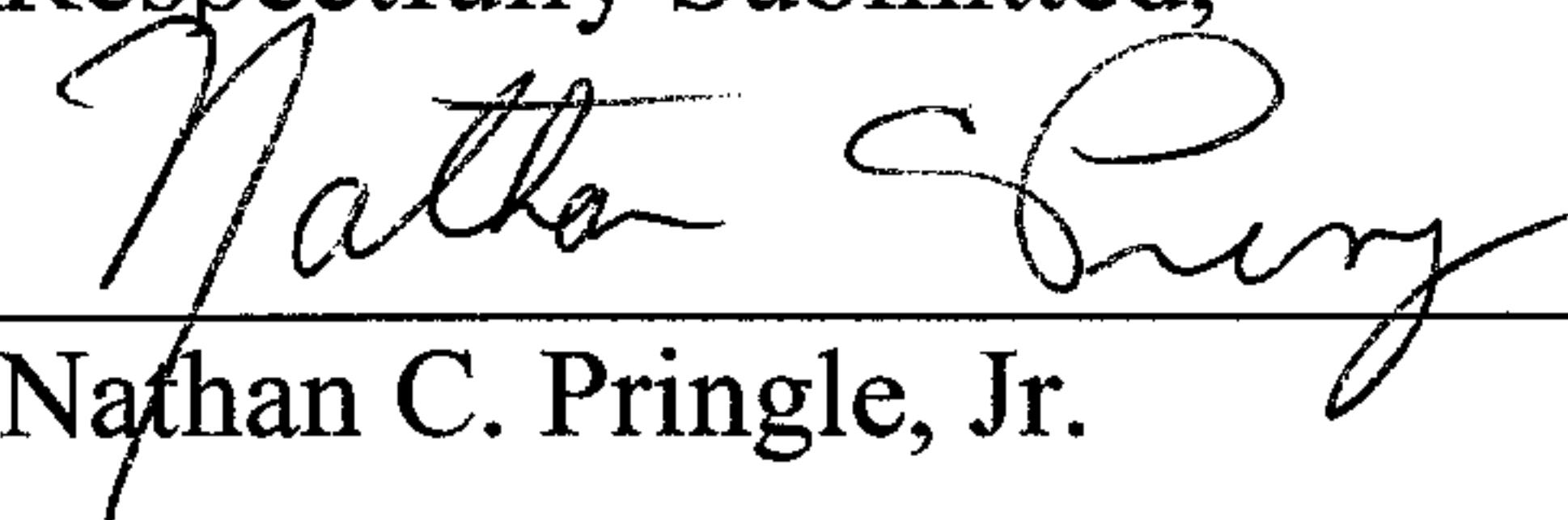
**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BARBARA A. WILHELM,	:	
Plaintiff	:	
	:	
v.	:	NO. 1:CV-01-1057
	:	
COMMONWEALTH OF PA.;	:	(JUDGE RAMBO)
PENNSYLVANIA STATE POLICE;	:	
COLONEL PAUL J. EVANKO,	:	
COMMISSIONER; LIEUTENANT	:	
COLONEL THOMAS K. COURY; and	:	
CAPTAIN MICHAEL. D. SIMMERS,	:	
Defendants	:	

CERTIFICATE OF CONCURRENCE

Nathan C. Pringle, Esquire, counsel for the plaintiff, certified that on May 1, 2003, he spoke with Susan J. Forney, Esquire, counsel for defendants, regarding an enlargement of file a petition for attorney's fees and costs. Ms. Forney has no objection to this request.

Respectfully Submitted,

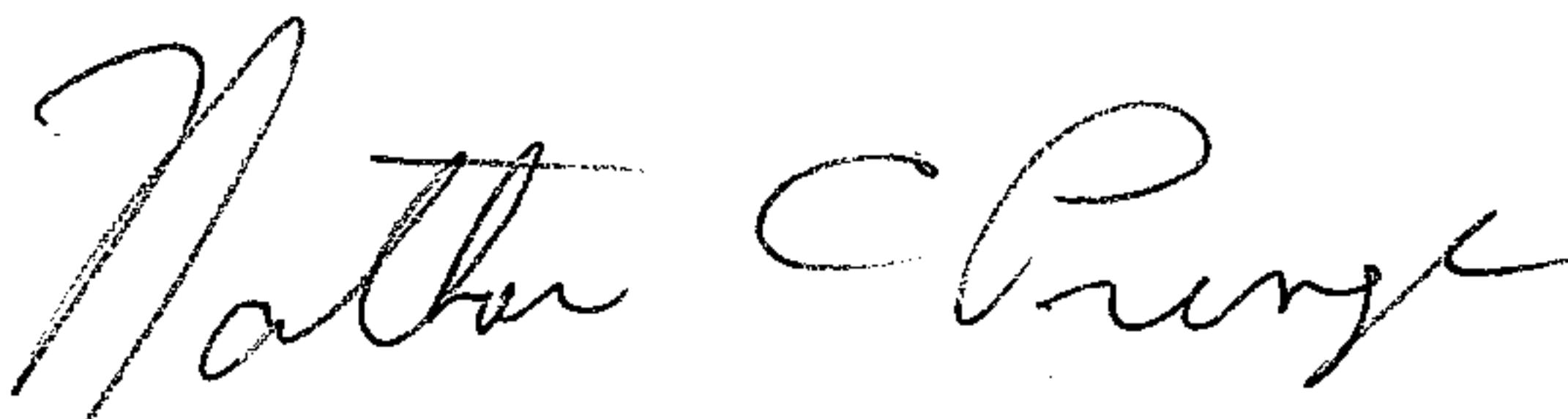


Nathan C. Pringle, Jr.

CERTIFICATE OF SERVICE

I, Nathan C. Pringle, Jr., hereby certify that on May 1, 2003, I caused to be delivered by first class mail a copy of the foregoing document entitled Plaintiff's Uncontested Motion for an Enlargement of Time to File Petition for Attorney's Fees and Cost upon the following:

Susan J. Forney
Chief Deputy Attorney General
Office of Attorney General
Litigation Section
15th Floor, Strawberry Square
Harrisburg, PA 17120



Nathan C. Pringle, Jr.